

Exhibit D

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CLRB HANSON INDUSTRIES, LLC,)
etc., et al.,)
)
)
Plaintiffs,)
)
)
v.) Case No.
)
) 05-03639 JW
GOOGLE, INC.,)
)
)
)
Defendant.)
)

30 (b) (6) DEPOSITION OF BRETT R. HANSON

August 18, 2006

228010



(310) 207.8000	Los Angeles	(916) 922.5777	Sacramento	(818) 702.0202	San Fernando Valley
(949) 955.0400	Orange County	(408) 885.0550	San Jose	(858) 455.5444	San Diego
(415) 433.5777	San Francisco	(951) 686.0606	Inland Empire	(760) 322.2240	Palm Springs

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2 UNITED STATES DISTRICT COURT
3 NORTHERN DISTRICT OF CALIFORNIA
4 SAN JOSE DIVISION

5 -----x
6 CLRB HANSON INDUSTRIES, LLC d/b/a
7 INDUSTRIAL PRINTING, and HOWARD
8 STERN, on behalf of themselves and
9 all others similarly situated,

10 Plaintiffs,

11 v. Case No.
12 05-03639 JW

13 GOOGLE, INC.,

14 Confidential
15 Portions Bound
16 Defendant. Separately

17 -----x

18 August 18, 2006

19 9:45 a.m.

20 30 (b) (6) VIDEOTAPED DEPOSITION

21 of CLRB HANSON INDUSTRIES d/b/a
22 INDUSTRIAL PRINTING by BRETT R. HANSON,
23 taken by Defendant, pursuant to notice,
24 held at the offices of Thacher Proffitt
25 & Wood, 2 World Financial Center, New
York, New York, before Amy E. Sikora,
CRR, CSR, RPR, Certified Realtime
Reporter, Certified Shorthand Reporter,
Registered Professional Reporter, and
Notary Public within and for the State
of New York.

1
2 A P P E A R A N C E S:

3 WOLF POPPER LLP

4 Attorneys for Plaintiffs and the Proposed Class

5 845 Third Avenue

6 New York, New York 10022

7 BY: LESTER L. LEVY, ESQ.

8 MICHELE F. RAPHAEL, ESQ.

9 PERKINS COIE LLP

10 Attorneys for Defendant

11 180 Townsend Street

12 San Francisco, CA 94107-1909

13 BY: DAVID T. BIDERMAN, ESQ.

14 M. CHRISTOPHER JHANG, ESQ.

15
16 ALSO PRESENT:

17 THOMAS DELVECCHIO, Videographer

18

19

20

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23

24

25

1 B. Hanson

0:08 2 an AdWords program, and entered the
0:08 3 information that was requested of me.

0:08 4 Q. And this is sometime in
0:08 5 July 2002, as best as you recall?

0:08 6 A. Yes, sir.

0:08 7 Q. And did you review any materials
0:08 8 on the Google site before you made the
0:08 9 decision to join the AdWords program?

0:08 10 A. I remember the page -- the
0:09 11 sign-up page saying it was an easy-to-use
0:09 12 pay-for-click program. That it was a -- we
0:09 13 controlled the -- the program from a -- from
0:09 14 a budget standpoint. We controlled the cost
0:09 15 per click. We controlled the daily budget.

0:09 16 And that's what intrigued me to the value
0:09 17 proposition that Google offered at that time.

0:09 18 Q. And when did you first see the
0:09 19 page that you just described?

0:09 20 A. I think it's the first page that
0:09 21 was presented to me.

0:09 22 Q. Okay. As part of the AdWords
0:09 23 sign-in?

0:09 24 A. Yes, sir.

0:09 25 Q. And had you reviewed any

1 B. Hanson

1:27 2 interrupt you? And what -- what caused you
1:27 3 to use the pausing feature?

1:27 4 A. It's a unique selling feature
1:27 5 allowing you to turn off and on your costs.
1:27 6 Having more ability to control the costs
1:27 7 associated with your pay-for-click
1:27 8 advertising. I thought that was an asset of
1:27 9 Google's that others did not have.

1:27 10 Q. Okay. And what did you use the
1:27 11 pausing feature to accomplish?

1:27 12 A. That was my cost certain. If I
1:27 13 had a daily budget of \$100 and my costs at
1:27 14 that certain time were -- were, as an
1:27 15 example, \$52 to my \$100 budget, I wasn't
1:27 16 going to spend more than \$52 that day,
1:28 17 period.

1:28 18 Q. So could you give me an example
1:28 19 of how you would implement that pausing?

1:28 20 A. Just go in and click. There's a
1:28 21 button that says, "Pause."

1:28 22 Q. Okay. But you said you'd look
1:28 23 at your billing summary; right?

1:28 24 A. Look at my daily budget, that's
1:28 25 on one page. You've got your campaign name,